

1 THE HONORABLE BARBARA J. ROTHSTEIN  
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7 IN THE UNITED STATES DISTRICT COURT  
8 FOR THE WESTERN DISTRICT OF WASHINGTON  
9 AT SEATTLE

10 JENNIFER MILLER, CHRISTOPHER CAIN,  
11 JOSE GRINAN, KIMBERLY HALO, KELLY  
12 KIMMEY, JUMA LAWSON, SHARON  
13 PASCHAL, and PHILIP SULLIVAN, on behalf  
14 of themselves and all others similarly situated,

15 Plaintiff,

16 v.

17 AMAZON.COM, INC., and AMAZON  
18 LOGISTICS, INC.,

19 Defendants,

20 Case No. 2:21-cv-00204-BJR

21 **STIPULATED MOTION TO EXTEND  
22 CASE DEADLINES**

23 Plaintiffs and Defendants, Amazon.com, Inc., and Amazon Logistics, Inc., (together the  
24 “Parties”), stipulate and hereby jointly request that the Court enter an order extending (1)  
Defendants’ deadline to respond to Plaintiffs’ Third Amended Class Action Complaint from  
December 26, 2024, to January 31, 2025, (2) the Joinder of Parties deadline from January 31, 2025,  
to February 14, 2025, (3) the deadline for Amended Pleadings from February 7, 2025, to February  
21, 2025, and (4) the Class Certification Discovery Cutoff from February 14, 2025, to March 14,  
2025, as set forth below.

25 STIPULATED MOTION TO EXTEND CASE  
26 DEADLINES

27 – PAGE 1

28 Case No. 2:21-cv-00204-BJR

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1. On December 11, 2024, Defendants consented to leave to file, and Plaintiffs filed,  
2 a Third Amended Class Action Complaint (the “TAC”). Dkt. No. 101. Defendants’ response to  
3 the TAC is currently due December 26, 2024.

4. The Parties have conferred and agree that additional time is warranted for  
5 Defendants to respond to the TAC. The Parties have agreed to extend the Defendants’ deadline to  
6 respond to the TAC to January 31, 2025. Extending this deadline will not delay litigation of this  
7 case.

8. Under the Court’s current scheduling order (Dkt. No. 86), the Parties’ Joinder of  
9 Parties deadline falls on January 31, 2025. Further, the deadline for Amended Pleadings falls on  
10 February 7, 2025. In order to keep the schedule items related to the TAC consistent, the Parties  
11 have agreed to also extend the Joinder of Parties deadline to February 14, 2025, and the deadline  
12 for Amended Pleadings to February 21, 2025.

13. Under the Court’s current scheduling order (Dkt. No. 86), the deadline to complete  
14 discovery on class certification is currently February 14, 2025, and the deadline for Plaintiffs to  
15 file their motion for class certification is March 14, 2025.

16. While the Parties have been cooperating to accomplish class certification  
17 discovery prior to the February 14, 2025, deadline, the parties anticipate that additional  
18 discovery—including depositions —will extend past the February 14, 2025, cutoff. The Parties  
19 agree that the necessary discovery can be completed by March 14, 2025, the deadline for filing a  
20 motion for class certification, without impacting the briefing deadlines. Therefore, the Parties  
21 jointly request that the Court enter an order extending the class certification discovery cutoff to

22 STIPULATED MOTION TO EXTEND CASE

23 DEADLINES

24 – PAGE 2

Case No. 2:21-cv-00204-BJR

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1 March 14, 2025. Doing so will not otherwise alter any of the class certification briefing deadlines  
2 set by the Court.

3 For the reasons stated above, the Parties respectfully request the Court enter the [Proposed]  
4 Order that extends Defendants' deadline to respond to Plaintiffs' Third Amended Class Action  
5 Complaint, the Joinder of Parties deadline, the deadline for Amended Pleadings, and the Class  
6 Certification Discovery Cutoff.

7 IT IS SO STIPULATED.

8 DATED this 19th day of December, 2024.

22 STIPULATED MOTION TO EXTEND CASE  
23 DEADLINES

24 – PAGE 3

Case No. 2:21-cv-00204-BJR

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61 STIPULATED MOTION TO EXTEND CASE  
62 DEADLINES

63 - PAGE 4

64 Case No. 2:21-cv-00204-BJR

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## ORDER

The Stipulated Motion to Extend Case Deadlines, ECF No. 103, is GRANTED.

1. Defendants shall respond to Plaintiffs' Third Amended Class Action Complaint by January 31, 2025.

2. The Joinder of Parties deadline is hereby continued from January 31, 2025, to February 14, 2025.

3. The deadline for Amended Pleadings is hereby continued from February 7, 2025, to February 21, 2025.

4. The Class Certification Discovery Cutoff is hereby continued from February 14, 2025, to March 14, 2025. The remainder of the Court's scheduling order (Dkt. No. 86) remains in effect except as modified herein.

5. Stipulated Motion, ECF No. 102, is struck as moot.

DATED this 20th day of December 2024.

Barbara Rothstein

THE HONORABLE BARBARA J. ROTHSTEIN  
UNITED STATES DISTRICT JUDGE

STIPULATED MOTION TO EXTEND CASE  
DEADLINES  
- PAGE 5  
Case No. 2:21-cv-00204-BJR

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14 STIPULATED MOTION TO EXTEND CASE  
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16 - PAGE 6

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